

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)	
IMPLANT PRODUCTS LIABILITY)	MDL NO. 2272
LITIGATION)	
)	
This Document Relates to All Cases)	Master Docket Case No. 1:11-cv-05468
)	
)	Hon. Rebecca R. Pallmeyer

**ZIMMER'S REQUEST FOR ORAL ARGUMENT ON ITS MOTION TO DISMISS,
IN PART, MASTER LONG FORM COMPLAINT AND JURY DEMAND**

Pursuant to Local Rule 78.3, the defendant, Zimmer, Inc. ("Zimmer"),¹ respectfully requests that the Court schedule oral argument on Zimmer's Motion to Dismiss, in part, Plaintiffs' Master Long Form Complaint And Jury Demand [Dct. 258 and 259] ("Motion"). Zimmer's Motion addresses each of Plaintiffs' nine primary theories on several grounds, and in particular seeks application of the holdings in *Ashcroft v. Iqbal*, 129 S. Ct. 1937, 1949 (2009) and *Bell Atlantic v. Twombly*, 550 U.S. 554 (2007) to several of those theories. The Court's ruling on the Motion may significantly affect the course of this MDL. Accordingly, Zimmer asks that the Court set aside at least 30 minutes per side for argument on the Motion, either at the June 1, 2012, status conference, or at such other time as the Court may deem appropriate.

The Motion will be fully briefed by May 14, 2012.

¹ This Motion is in support of Zimmer's Motion to Dismiss brought by all defendants.

Respectfully submitted,

FAEGRE BAKER DANIELS LLP

/s/ Joseph H. Yeager, Jr.

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Associates, Inc. (incorrectly named as Zimmer Melia
& Associates, Inc.), Zimmer Orthobiologics, Inc., and
Zimmer US, Inc.

CERTIFICATE OF SERVICE

I certify that on March 14, 2012, a copy of the foregoing Zimmer's Request For Oral Argument On Its Motion To Dismiss, In Part, Master Long Form Complaint And Jury Demand, was filed electronically. Parties may access this filing through the Court's ECF/CFM system.

/s/ Joseph H. Yeager, Jr.